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November 18, 2002

EX PARTE

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

**Re: WC Docket No. 02-314 – Application of Qwest
Communications International Inc. for Authorization to
Provide In-Region InterLATA Service in the States of
Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota,
Utah, Washington and Wyoming**

Dear Ms. Dortch:

Qwest Communications International Inc. (“Qwest”) submits this filing at the request of Commission staff to clarify Qwest’s earlier statements regarding an Eschelon *ex parte* filing submitted in the Qwest I and II proceedings.¹

In its *ex parte* filing, Eschelon claimed that LSRs manually handled by Qwest are subject to error rates as high as 40%.² As explained in Qwest’s Application, this figure is wildly overstated and lacks any basis in fact. Eschelon based its figure on its purported comparison of Pending Service Order Notifications (“PSOs”) to Local Service Requests (“LSRs”). After learning of Eschelon’s claims, Qwest asked to review the relevant data collected by Eschelon and received a mere seven occurrences dating from August 26 through September 6, 2002.³

¹ See *Qwest Consolidated Application for Authority to Provide In-Region, InterLATA Services in Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming*, WC Docket No. 02-314, filed September 30, 2002, (“Application”) at Tab 1, pages 5-7. The Eschelon *ex parte* submission to which Qwest responded was filed on September 4, 2002. See Eschelon Ex Parte, WC Docket Nos. 02-149 and 02-189, at 10-11.

² See *id.*

³ This period included a three-day holiday weekend.

To obtain a more representative sample for its own analysis, Qwest examined 2,118 call center tickets opened by Eschelon during a longer period, August 19, 2002 through September 13, 2002. During that period, only 41 tickets could reasonably be determined to have identified a problem with the PSN. Qwest compared that figure to the number of LSRs electronically submitted by Eschelon during that same period. That number, 3843, was based on a combination of two figures in this same time period: the denominator of PO-5A – electronically submitted, electronically handled LSRs (1605) – *and* the denominator of PO-5B – electronically submitted, manually handled LSRs (2238).⁴ This resulted in a PSN to LSR mismatch rate of 1.066%.

The 20-page limit does not apply to this filing.

Respectfully submitted,

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⁴ Note that this figure was neither derived from the number of trouble tickets submitted to the call center nor from the number of manually-handled orders. If only the latter were used (*i.e.*, the result of PO-5B alone), the error rate would have been 1.83%.